

The Following Compelling, Indisputable Science Reveals Timber Harvest Activities Will Inflict Major, Tragic Damage to the Natural Resources in and Downstream from the Sale Area. The Cutting Units and New Roads will also Harm the Recreational Opportunities and Scenery.

The following “Opposing Views” present scientific information that disproves the USFS claim that logging benefits the natural resources in the forest. These “Opposing Views” are subject to 40 CFR 1502.9(b). The views are not irresponsible and they weren’t adequately discussed or considered in this NEPA document.

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FS Response: The purpose for this project (EA at 1-4) “The purpose of the Chetco Bar Fire Salvage project is to capture timber value in the matrix land allocations by harvesting dead, dying and/or damaged trees resulting from the 2017 Chetco Bar fire.”

FS Response: No reference to forest management, salvage sales, or anything connected to this project. No detailed response warranted.

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Timber Harvest Opposing View “According to a 1998 poll by a firm that has worked for several Republican House members and two presidents, 69 percent of Americans oppose commercial logging on federally owned land. The Forest Service's own poll showed that 59 percent of Americans who expressed an opinion oppose timber sales and other commodity production in national forests.”

“Many Americans are surprised to learn that logging is even allowed on public lands. Alas, it has been since the Organic Act of 1897 first authorized logging in America's new forest reserves.”

Barry, John Byrne. “**Stop the Logging, Start the Restoration**”
from *The Planet* newsletter
June 1999, Volume 6, Number 5
<http://vault.sierraclub.org/planet/199905/ec11.asp>

FS Response: Opinion.



Timber Harvest Opposing View “Federal auditors have found that the Forest Service frequently fails to assess, prevent or correct environmental damage from logging on the national forests.

After inspecting 12 timber projects in the field from 1995 to 1998, the Agriculture Department's inspector general found that all were deficient and that “immediate corrective action is needed.”

Cushman, John H. Jr. “**Audit Faults Forest Service on Logging Damage in U.S. Forests**” *New York Times*, February 5, 1999
<http://query.nytimes.com/gst/fullpage.html?res=9B00E2DF163BF936A35751C0A96F958260&sec=&spon=&pagewanted=print>

http://www.ncpa.org/sub/dpd/index.php?Article_ID=12468

The 75-page report, three years in the making, notes there are dramatic economic and social losses when forests are logged under the U.S. Forest Service's timber-sale program.

Higgins, Margot, “**National forest logging is bad business, study says**”
Posted on CNN.com-Nature, March 16, 2000
<http://www.colorado.edu/AmStudies/lewis/west/costlogging.pdf>

project. Effects to both recreation and aquatics are discussed in Chapter 3.

Ehrlich, Anne Ph.D., David Foster Ph.D. and Peter Raven Ph.D. 2002
“Scientists Seek Logging Ban on U.S.-Owned Land”
New York Times, April 16, 2002
<http://www.nytimes.com/2002/04/16/us/scientists-seek-logging-ban-on-us-owned-land.html>

Timber Harvest Opposing View "The proposition that forest values are protected with more, rather than less logging, and that forest reserves are not only unnecessary, but undesirable, has great appeal to many with a vested interest in maximizing timber harvest. These ideas are particularly attractive to institutions and individuals whose incomes depend upon a forest land base." (page 2)

"On the other hand, approaches that involve reserving of a portion of the land base, or harvest practices that leave commercially valuable trees uncut to achieve ecological goals, are often considered much less desirable as they reduce traditional sources of timber income." (page 2)

Franklin, Jerry Ph.D., David Perry Ph.D., Reed Noss Ph.D., David Montgomery Ph.D. and Christopher Frissell Ph.D. 2000. **"Simplified Forest Management to Achieve Watershed and Forest Health: A Critique."**
<http://www.coastrange.org/documents/forestreport.pdf>

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Timber Harvest Opposing View “We do not believe, however, that scientific literature or forestry experience supports the notions that intensively managed forests can duplicate the role of natural forests, or that sufficient knowledge and ability exist to create even an approximation of a natural old-growth forest stand.” (page 3)

Franklin, Jerry F. Ph.D. and James K. Agee Ph.D.
“**Forging a Science-Based National Forest Fire Policy.**”
Issues in Science and Technology. Fall 2003
A National Wildlife Federation publication sponsored by the Bullitt Foundation
<http://issues.org/20-1/franklin/>

FS Response: Relevant, we are using science outlined in paper.



Timber Harvest Opposing View “Managers on the Wolverine fire still opted to cut one of the largest firelines ever in Washington, logging 114 acres of critical spotted owl habitat and felling big trees — including a giant that had stood for centuries, so large, it was a one-log load on a semi truck. Steel-tracked heavy equipment tore up fragile ground along streams. Erosive soils unique to the area were bulldozed.

Cut by the U.S. Forest Service with none of the usual environmental review, the firebreak was up to 300 feet wide and stretched more than 50 miles, from the Entiat drainage on the east, to Twin Lakes to the west. Loggers cut enough trees to fill more than 930 logging trucks.

Yet the fire never came anywhere near.”

Rushing to stop a fire that never came, Forest Service logged miles of big trees, critical habitat
Seattle Times, August 9, 2016
<http://projects.seattletimes.com/2016/collateral-damage/>



Timber Harvest Opposing View "SEC. 3. FINDINGS.

Congress finds the following:

Commercial logging has many indirect costs which are very significant, but not easily measured, such as flooding damage and relief of flooding damage through Federal funds, damage to the salmon fishing industry; and harm to the recreation and tourism industries."

House Bill H. R. 1494 text. April 4, 2001
http://www.ontheissues.org/House/Bill_Luther_Environment.htm

FS Response: Not relevant. Discussion on a bill that never came to a vote prohibiting commercial logging on Federal public lands.



Timber Harvest Opposing View "Human tampering with nature has not been without costs. Human manipulation of existing ecosystems has also sometimes had unfortunate consequences."

Hudak, Mike Ph.D. **"From Prairie Dogs to Oysters: How Biodiversity Sustains Us"**
from his book review of
The Work of Nature: How the Diversity of Life Sustains Us
by Yvonne Baskin, 1997
Newsletter of Earth Day Southern Tier, February/March 1999, p. 2
<http://www.mikehudak.com/Articles/FromPrairieDogs9902.html>

FS Response: Opinion, published in newsletter.



Timber Harvest Opposing View "The Quincy Library Group's (QLG's) fuelbreak strategy represents a giant step backwards from the progressive development of rational fire policies established by the 1995 Federal Wildland Fire Management Policy and Program Review."

"The fact that the QLG admits that its Plan is inconsistent with these new policies (indeed, is almost gleefully defiant of them) says a lot about the credibility of the QLG's self-purported fire management expertise."

"In spite of (or more likely because of) the intensive 'fuels reduction' activities associated with commercial logging, the Fountain Fire was truly catastrophic in its effects."

"Even 'kinder, gentler' commercial logging still inflicts environmental impacts such as eroded topsoil, degraded water quality, destroyed wildlife habitat, and extirpated species that are every bit as much symptoms of forest health problems as large-scale, severe wildfires."

"And after spending millions of dollars creating the SNEP Report, it seems wise to use its information, not ignore it or opportunistically select out statements clearly worded as assumptions, values, or goals which run contrary to factual research findings. The QLG Plan has much more to do with timber extraction than with genuine fire protection, and in that respect, it constitutes more of a forest health threat than a real solution."

"The QLG Bill resembles similar 'panic legislation' that was passed during the early 1970s in which, following some large-scale wildfires in California, Congress allowed the Forest Service to access emergency firefighting funds to conduct 'presuppression' timber sales. Many fuelbreaks were cut in the Sierras during this period, and while costs rapidly rose into tens of millions of dollars, most of these fuelbreaks failed to perform adequately during wildfire suppression incidents. Congress quickly had to take away this funding source from the Forest Service. What has become of these old fuelbreaks? Almost without exception, the agency failed to monitor or maintain them, and in a modern-day version of 'cut and run' logging, many of these old fuelbreaks have converted to chaparral brush and 'dog-hair' thickets ... a much more flammable vegetation type than the original forest cover. The QLG Bill appears to be 'deja vu' without evidence of Congress or the QLG being aware of this history of previous fuelbreak programs."

Ingalsbee, Timothy Ph.D. **"Logging for Firefighting: A Critical Analysis**

Unpublished research paper. 1997.

https://www.amazon.com/Cut-Run-Loggin-Off-Woods/dp/0764315293/ref=cm_cr_ar_p_d_product_top?ie=UTF8

<http://www.klamathforestalliance.org/Documents/loggingwithoutlimits.html>

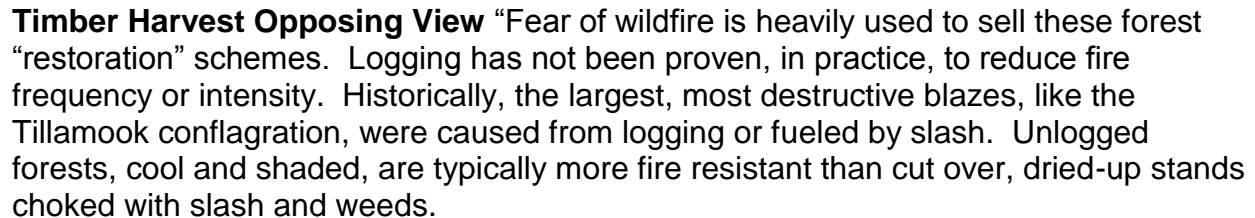
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Ingalsbee, Timothy Ph.D. September 2007, "**A Reporter's Guide to Wildland Fire.**"
<http://www.fusee.org/Resources/Documents/-Reporters%20Guide%202007.pdf>

Timber Harvest Opposing View “Logging-truck traffic in the Kimsquit Valley in British Columbia resulted in a 78% reduction in use of the “Zone of Hauling Activity” by radio collared bears compared to non-hauling periods (16). For 14 hours/day, 3%-23% of each bear's home range was unavailable to them because of disturbance.”

Jalkotzy, M.G., P.I. Ross, and M.D. Nasserden. 1997. **"The Effects of Linear Developments on Wildlife: A Review of Selected Scientific Literature."** Prepared for Canadian Association of Petroleum Producers. Arc Wildlife Services Ltd., Calgary. 115pp. <http://www.arlis.org/docs/vol1/A/65937142.pdf>

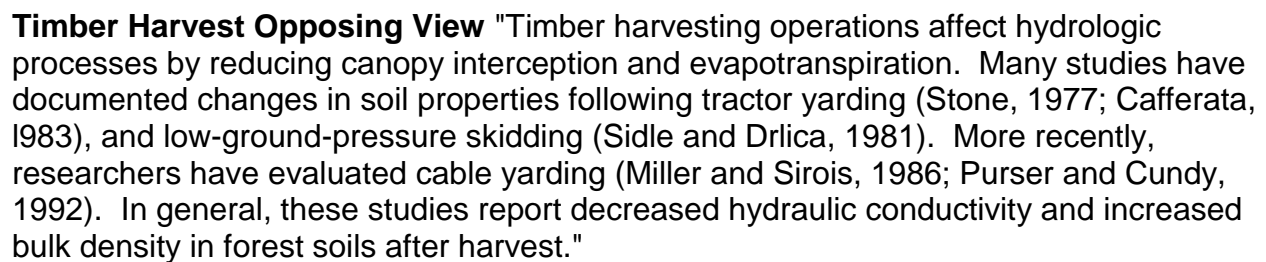
FS Response: Relevant. Effects to wildlife are outlined in the EA in chapter 3, wildlife section.



Large-scale logging (by any name) has devalued our forests, degraded our waters, damaged soils, and endangered a wide variety of plants and animals. How will the current round of politically and environmentally propelled ‘restorative’ logging proposals differ, in practice, from past logging regimes?”

Keene, Roy **Restorative Logging? “More rarity than reality”**
Guest Viewpoint, the Eugene *Register Guard*, February 23, 2012
<http://eugeneweekly.com/2011/03/03/views3.html>

FS Response: Opinion. Detailed response not required.



Keppeler, Elizabeth T. Robert R. Ziemer Ph.D., and Peter H. Cafferata
"Effects of Human-Induced Changes on Hydrologic Systems."
 An American Water Resources Association publication, June 1994
<http://www.fs.fed.us/psw/publications/ziemer/Ziemer94a.PDF>

Klein, AI 2004. **Logging Effects on Amphibian Larvae Populations in Ottawa National Forest.**
<http://underc.nd.edu/assets/216499/fullsize/klein2004.pdf>

Mann, Charles C. Ph.D. and Mark L. Plummer Ph.D.
“Call for 'Sustainability' in Forests Sparks a Fire”
Science 26 March 1999: Vol. 283. no. 5410, pp. 1996 – 1998
<http://www.sciencemaq.org/content/283/5410/1996.summary>

Report accuses Forest Service of mismanagement
Associated Press, *Bellingham Herald*, July 11, 2002.
http://www.citizenreviewonline.org/july_2002/report_accuses.htm

[REDACTED]

FS Response: Agreed. Accurate article but current management practices on the Forests use an interactive approach for ecologically sustainable forestry. This particular project would only manage a small percent of entire fire perimeter, in essence managing the whole landscape.

“The service should have done a full environmental review and done a better job projecting the impact on wildlife and forest conditions, ruled U.S. District Judge Frank C. Damrell Jr.”

<http://www.wildcalifornia.org/media/epic-in-the-news/judge-blocks-klamath-logging-plan/>

FS Response: Outlines a law suit in Northern California. Effects to all resources are disclosed in Chapter 3 of the EA.

<http://motherjones.com/politics/2002/08/fight-fire-logging>

FS Response: Opinion piece. Not written by fire scientists.



Timber Harvest Opposing View “That makes four timber projects since May in which U.S. District Judge Dana Christensen found fault with the U.S. Forest Service and the U.S. Fish and Wildlife Services' conclusion that cutting and burning in those areas would not significantly harm the big cats' territory.”

“Christensen ruled the Endangered Species Act requires the agencies to determine whether lynx "may be present" there, which is a lesser standard than what the agencies used in concluding lynx don't "occupy" the area.”

“The judge said the government approved those projects based on an unreliable conclusion they would not harm the lynx's critical habitat.”

Judge stops 3 Montana logging projects over lynx
By Matt Volz, Associated Press June 26, 2013
<http://news.yahoo.com/judge-stops-3-montana-logging-141919567.html>

FS Response: Outlines a law suit in Montana. Not relevant to this project area. Consultation on species required by the ESA is in progress and will be complete before the decision is signed.



Timber Harvest Opposing View “Less than 5% of America's original forests remain, and these forests are found primarily on federal lands. Logging in the last core areas of biodiversity is destroying the remaining intact forest ecosystems in the United States. At the current rate of logging, these forests and their priceless biological assets will be destroyed within a few decades.”

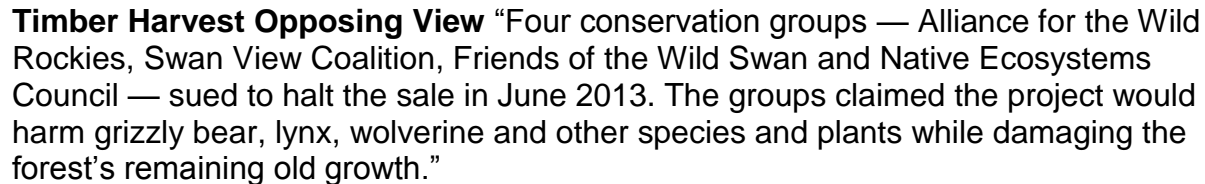
“We believe it is our professional responsibility to ask Congress to align Federal forest management with modern scientific understandings of forest ecosystems. Passage of the Act to Save America's Forests will give our nation's precious forest ecosystems the best chance of survival and recovery into the 21st century and beyond.”

FS Response: Opinion letter addressing outdated practices.

Raven, Peter, Ph.D.,
from his February 9, 2001 letter to Senator Jean Carnahan
<http://www.saveamericasforests.org/Raven.htm>

Timber Harvest Opposing View “The Water Board has identified wastes associated with timber harvest and vegetation management activities (as defined in Attachment A) as having a potential effect on water quality. These vegetation management activities have the potential to effect water quality by causing soil to discharge to a waterbody, slump or erode by wind, or be compacted or deformed which limits the soil’s ability to infiltrate or filter runoff.” (pg 2)

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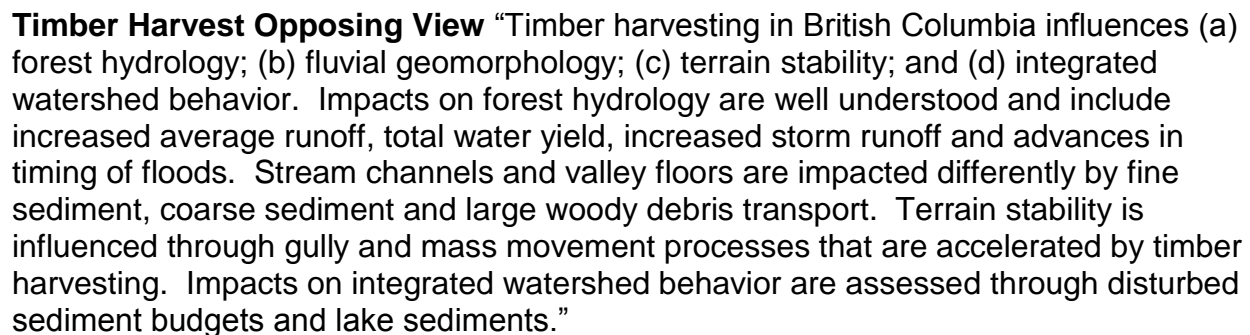
“The judge ordered the project be stopped and said these Forest Service lands have to be managed under federal environmental laws to protect native species just like all other national forests, Garrity said.

Judge Halts Glacier Loon Timber Sale in Swan Valley

Published in the *Flathead Beacon*, Sep 26, 2014

<http://flatheadbeacon.com/2014/09/26/judge-halts-glacier-loon-timber-sale-swan-valley/>

FS Response: Article talking about lawsuit in Montana. No detailed response warranted.



Slaymaker, Olav Ph.D. **"Assessment of the Geomorphic Impacts of Forestry in British Columbia"**

AMBIO: A Journal of the Human Environment 29(7):381-387. 2000

<http://www.bioone.org/doi/abs/10.1579/0044-7447-29.7.381>

FS Response: Research article. NOT relevant to this project. Research references B.C.

<http://www.bing.com/images/search?q=logging+impact+on+environment&qv=on+environment>

Timber Harvest Opposing View "After logging, peak pipeflow was about 3.7 times greater than before logging."

Ziemer, Robert R. Ph.D., "**Effect of logging on subsurface pipeflow and erosion: coastal northern California, USA.**" Proceedings of the Chengdu Symposium, July 1992. *IAHS Publication. No. 209*, 1992
<http://www.fs.fed.us/psw/publications/ziemer/Ziemer92.PDF>

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The real threat facing forests are excessive logging, clearcutting and roadbuilding that homogenize and destroy soil, watersheds and biodiversity of native forests.”

Partridge, Arthur Ph.D., professor emeritus, University of Idaho
**Statement at a Press Conference with Senator Robert Torricelli
about S. 977 and HR 1376), the Act to Save America’s Forests**
April 28, 1998, U.S. Capitol
<http://www.saveamericasforests.org/news/ScientistsStatement.htm>

FS Response: Opinion and testimony. Excerpts not relevant to this project.

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Timber Harvest Opposing View “Extreme disturbances, such as wildfire or tractor logging, cause the loss of nutrients, mycorrhizae, and organic matter. These combined losses reduce long-term site productivity and may lead to sustained periods of extended erosion that could exacerbate degradation.

Elliot, W.J.; Page-Dumroese, D.; Robichaud, P.R. 1999. **The effects of forest management on erosion and soil productivity.**
From the proceedings of the Symposium on Soil Quality and Erosion Interaction, Keystone, CO, July 7, 1996. Ankeney, IA: Soil and Water Conservation Society. 16 p.
<http://forest.moscowfs.wsu.edu/cgi-bin/engr/library/searchpub.pl?pub=1999c>

FS Response: Agree. This project analyzes the impact to soils from project activities in the EA on page 3-72.

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Timber Harvest Opposing View “The lawsuit raises concerns that land managers erred in their finding that the project will not hurt wildlife habitat – particularly that of lynx, bull trout and grizzly bears – and violated the National Environmental Policy Act by never completing an environmental impact statement. The groups have also filed separate legal notices of intent to challenge two similar thinning projects in the Flathead National Forest.”

WUERTHNER, GEORGE, **Why are Conservation Groups Advocating Logging Public Forests?**

<http://www.counterpunch.org/2012/09/27/why-are-conservation-groups-advocating-logging-public-forests/>

Timber Harvest Opposing View “Deforestation is clearing Earth's forests on a massive scale, often resulting in damage to the quality of the land. Forests still cover about 30 percent of the world’s land area, but swaths half the size of England are lost each year.”

Deforestation

<http://www.nationalgeographic.com/environment/global-warming/deforestation/>

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Timber Harvest Opposing View “It is impossible to overstate the importance of humankind's clearing of the forests. The transformation of forested lands by human actions represents one of the great forces in global environmental change and one of the great drivers of biodiversity loss. The impact of people has been and continues to be profound. Forests are cleared, degraded and fragmented by timber harvest, conversion to agriculture, road-building, human-caused fire, and in myriad other ways. The effort to use and subdue the forest has been a constant theme in the transformation of the earth, in many societies, in many lands, and at most times. Deforestation has important implications for life on this planet.”

Global Deforestation

Published by the University of Michigan

<http://resilience.earth.lsa.umich.edu/units/deforestation/index.html>

FS Response: FS Policy does not allow for converting forest into non-forest. Not relevant.



Timber Harvest Opposing View “Photosynthesis is one of only two significant mechanisms for removing carbon dioxide from the atmosphere (the other being dissolution into water, leading to destructive ocean acidification). Carbon dioxide is released when trees are cut down, and deforestation accounts for [at least 15 percent](#) of global carbon emissions. Thus, cutting down trees is a double-whammy because we not only lose carbon capture capacity, but we release more carbon, too.”

Trees Are Our Climate Saviors - So Stop Logging on Public Land

The Huffington Post, 02/12/2014

http://www.huffingtonpost.com/ellen-moyer-phd/trees-are-our-climate-logging_b_4775894.html

FS Response: Opinion. Additionally climate change is addressed in chapter 3 at 3-164.

Timber Harvest Opposing View “Logging activities have numerous impacts on aquatic systems in the Sierra Nevada. The end result of logged landscapes is a highly altered forest system which creates significant problems related to erosion, sedimentation and altered stream flow patterns. Logging removes large trees that normally fall into streams and provide shelter and thermal cover, raises water temperatures and pH, and degrades the chemical and ecological conditions and food webs that fish need to survive. Logging and the roads created to facilitate logging also significantly degrade stream ecosystems by introducing high volumes of sediment into streams, changing natural streamflow patterns, and altering stream channel morphology. Areas that have been logged are far more likely to suffer from major landslides and erosion events which deposit abnormally high levels of sediment into area streams. Roads, ditches, and newly created gullies form new, large networks of flow paths across the landscape. These logged areas therefore, sustain much higher discharge volumes after a storm event than they ever did when the forest was intact.”

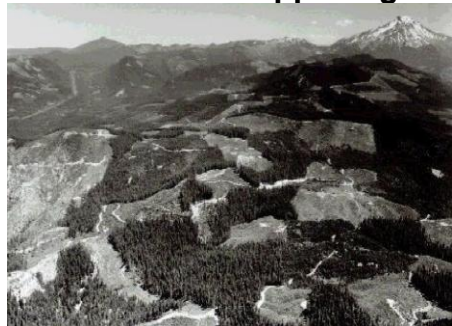
Logging Impacts

Published by Sierra Forest Legacy, 2012

http://www.sierraforestlegacy.org/FC_FireForestEcology/FFE_LoggingImpacts.php

FS Response: This is a general website advertising the Sierra Forest Legacy group, whom is opposed to logging. All opinion.

Timber Harvest Opposing View



Pacific Salmonids: Major Threats and Impacts

<http://www.nmfs.noaa.gov/pr/species/fish/salmon.html>

[illegible]

Palmisano, Joseph, **Logging in National Parks and Forests: A contentious Debate**
Published by Law/Street, October 3, 2014

Published by Earth Justice, June 30, 2016

FS Response: Article outlining the Tongass NF forest plan, not relevant to this project.

Published by *Helena Independent Record*, March 6, 2012

FS Response: Unable to open article. Article about law suit in Montana. Not relevant to this project.

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natural resources. Ask yourself why the USFS budget for fire and timber sales is larger than all other line items combined. Now ask yourselves who or what the agency serves.